

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.202)
Table of Allotments)
For FM Broadcast Stations.)
(Shafter, California))

MM Docket No. 02-58
RM-10415

To: Assistant Chief, Audio Division, Media Bureau

**RESPONSE BY CLEAR CHANNEL BROADCASTING LICENSES, INC.
TO MOTION FOR LEAVE TO FILE SUPPLEMENT AND SUPPLEMENT TO
COMMENTS OF AMERICAN GENERAL MEDIA OF TEXAS, INC.**

Clear Channel Broadcasting Licenses, Inc. ("CCBL"), by its attorneys, hereby responds to the Motion for Leave to File Supplement and Supplement to Comments filed by American General Media of Texas, Inc. ("AGMT") (dated September 13, 2002) (the 'Supplemental Comments').

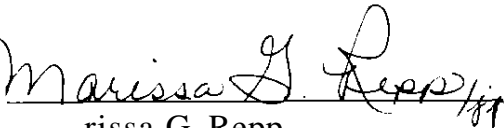
CCBL notes that whether or not the Commission grants AGMTs motion for leave to file its Supplemental Comments, AGMTs statements therein are irrelevant to the issue before the Commission. Specifically, AGMT does not, in its Supplemental Comments or in its prior submissions in this matter, meet the threshold for substituting channels while maintaining the same class -- that there is no available transmitter location from which the community can be served by a station operating on the existing channel. To the contrary, AGMT has specified reference coordinates in its proposal that meet the minimum distance separation

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rules and from which a Class A station would provide a city grade (70 dBu) signal over the entire community of Shafter from its existing allotment. Thus, AGMT has failed to set forth any reason relevant to the Commission's allotment priorities for approving AGMT's proposed replacement of Channel 282A with same-class Channel 226A. *See, e.g., Chester, Shasta Lake City, Alturas, McCloud, Weaverville, and Shingletown California*, Memorandum Opinion & Order, 13 FCC Rcd. 8549 at ¶13 (Policy and Rules, 1998) (Commission generally considers channels of the same class to be equivalent for allotment purposes).

Respectfully submitted,

**CLEAR CHANNEL
BROADCASTING LICENSES, INC.**

By: 
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October 31, 2002

Its Attorneys

CERTIFICATE OF SERVICE

I, Janine Jeter, hereby certify that, on this 31st day of October, **2002**, I have caused a copy of the foregoing Response to be delivered, by first-class mail, to the following:

W. Kenneth Ferree, Chief*
Media Bureau
Federal Communications Commission
445 – 12th Street, S.W.
Room **3-C740**
Washington, DC **20554**

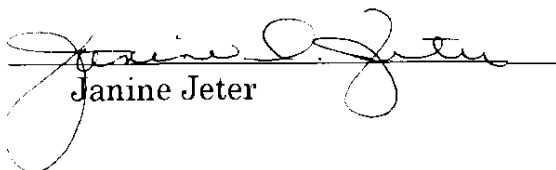
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* / By Hand Delivery